

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No: 4:18CR00295 AGF (JMB)
)
MARK VAN RONZELEN,)
)
Defendant.)

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, MARK VAN RONZELEN, by and through undersigned counsel, and for his Motion to Modify Conditions of Release, hereby states to the Court the following:

1. On August 31, 2018, this Court issued its Order Setting Conditions of Release wherein Defendant Van Ronzelen was ordered, *inter alia*, released to Home Detention with location monitoring as directed by Pretrial Services. Additionally, a designated residential address of 515 Great Oaks Meadow Drive, Wentzville, MO 63385 was mandated for purposes of location monitoring (GPS). *See* Order Setting Conditions of Release, Section 7(f), (p) and (q), on file with this Court as Doc. 135.

2. Also on August 31, 2018, this Court, of its own accord, issued another Order changing the designated address highlighted in 7(f) to a new address located at 2675 Blackforest Drive, St Louis, MO 63129. *See* Order, on file with Court as Doc. 138. This new order effectively changed Defendant's address from that of his girlfriend to that of his mother. Additionally, this order was filed in conjunction with this Court's Order Denying Motion for Pretrial Detention and Setting Conditions of Release, on file as Doc. 139.

3. At this juncture, Defendant Van Ronzelen desires to move back to the above-referenced Wentzville address where he would resume his life with girlfriend, Kristy Sullivan. To

date, Defendant has abided by the conditions of release, including those related to home detention, curfew and location of residence whether set by this Court's Order(s) and/or at the discretion of Pretrial Services.

4. Counsel for Defendant Van Ronzelen has confirmed with the assigned Pretrial Services Officer, Michael Warren, that his office would have no objection to the present request for modification. Mr. Warren further requested this motion be filed in order for his office to have any authority to allow Defendant Van Ronzelen to change addresses. Counsel also finds the present motion to be necessary in light of this Court's Order(s) regarding release and attendant supervision requirements.

5. Based on the above, Defendant Van Ronzelen requests this honorable Court issue its order modifying the original conditions of release as set forth in 7(f) in Doc. 135 and changed in Doc. 138 to allow a change of address to 515 Great Oaks Meadow Drive, Wentzville, MO 63385.

6. Counsel for Defendant has contacted the assigned Assistant United States Attorney, Jennifer Roy, who advised that her office would object to this request.

WHEREFORE, for the foregoing reasons, Defendant MARK VAN RONZELEN prays this Court grant his motion to modify and for any and other relief this Court feels just and prudent under the circumstances.

Respectfully Submitted,

THE LAW OFFICES OF JOHN M. LYNCH, LLC.

E/S/ JOHN M. LYNCH

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Attorney for Defendant Mark Van Ronzelen

Certificate of Service

I hereby certify that on January 17, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Jennifer Roy
Assistant United States Attorney
Thomas F. Eagleton Courthouse, 20th Floor
111 South Tenth Street
St. Louis, Missouri 63102

E/S John M. Lynch